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File No.: 129232

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Viral DRM, LLC,

Plaintiff,

v.

California Off Road Recovery Group  
LLC,

Defendant.

CASE NO. 8:24-cv-00871-FMO-AS

**PLAINTIFF'S REQUEST TO  
APPEAR REMOTELY FOR THE  
MOTION FOR DEFAULT  
JUDGMENT HEARING ON  
OCTOBER 10, 2024**

Judge: Hon. Fernando Manzano Olguin  
Magistrate Judge: Hon. Alka Sagar

I, JACQUELINE MANDEL, am an associate attorney at Sanders Law Group, counsel for Plaintiff in this action. The undersigned respectfully requests to virtually appear by telephone at the Motion for Default Judgment Hearing which is set for October 10, 2024 at 10:00 AM in Courtroom 6D of the above referenced Court.

The reason for the request is that a personal appearance will cause undue hardship due to the time and costs associated with travel, as Plaintiff's counsel's principal place of business is located in Uniondale, New York. Alternatively,

1 allowing Plaintiff's counsel to appear remotely will limit the significant fees and  
2 expenses in this fee shifting case that would otherwise be incurred should a  
3 physical appearance be required for this hearing. Defendant has been properly  
4 served with the Complaint and Notice of the pending Motion; however, Plaintiff  
5 has not received one communication from Defendant. There is no indication that  
6 Defendant intends to appear at this motion hearing.

7 Based upon the above, Plaintiff respectfully requests that the Court allow  
8 Plaintiff to appear via telephone for the October 10, 2024 Motion for Default  
9 Judgment Hearing.

10 DATED: October 4 , 2024

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12 SANDERS LAW GROUP

13 By: /s/ Jacqueline Mandel  
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